

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
(Southern Division)

PWG 17 CV 1898

JOE JOHNSON,

Plaintiff,

Case No.

17-1898-PWG

v.

CENTRAL CREDIT SERVICES LLC

Defendant.

FILED
LODGED

ENTERED
RECEIVED

JUL 10 2017

AL GREENBELT
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND

BY HEBHT

NOTICE OF REMOVAL

PLEASE TAKE NOTICE that pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, defendant, Central Credit Services, LLC ("CCS"), through undersigned counsel and pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, *et seq.*, hereby removes this action from the District Court of Maryland for Prince George's County, to the United States District Court for the District of Maryland. In support of this Notice of Removal, CCS states as follows:

1. On May 6, 2017, Plaintiff, Joe Johnson, commenced a civil action in the District Court of Maryland for Prince George's County, entitled and captioned *Joe Johnson v. Central Credit Services LLC*, Case No. 05020015135-2017 (hereinafter the "State Court Action"). No further proceedings in the State Court have occurred.

2. In the Complaint, Plaintiff alleges statutory causes of action against CCS under the Fair Credit Reporting Act ("FCRA"), 15 U.S.C. § 1681, *et seq.* A true and correct copy of Plaintiff's Complaint is attached hereto as **Exhibit "A."** Therefore, this

Court has jurisdiction over the State Court Action pursuant to 28 U.S.C. § 1331 because Plaintiff's Complaint alleges a cause of action arising under the laws of the United States. Because Plaintiff affirmatively alleges violations of the FCRA, the Complaint asserts a federal question under 28 U.S.C. § 1331 and is removable pursuant to 28 U.S.C. § 1441.

3. On June 13, 2017, CCS was served with a copy of the Summons and Complaint. Attached hereto as **Exhibits "B" and "C"** are the Summons and CT Corporation's Affidavit of Service, respectively.

4. The time within which CCS is required by the laws of the United States, 28 U.S.C. § 1446(b), to file this notice of removal has not yet expired. This Notice of Removal is timely, having been filed within 30 days of the date on which CCS was served with Plaintiff's Complaint. *See* 28 U.S.C. § 1446.

5. The District Court of Maryland for Prince George's County is located within the district of the United States District Court for the District of Maryland. Therefore, venue for purposes of removal is proper pursuant to 28 U.S.C. § 89(b) because the United States District Court for the District of Maryland embraces the place in which the removed action was pending. 28 U.S.C. § 1441(a).

6. Written notice of this Notice of Removal of this action is being immediately provided to the District Court of Maryland for Prince George's County. *See Exhibit "D"* attached hereto.

7. Written notice of this Notice of Removal of this action is being caused to be served on the Plaintiff.

8. CCS's Local Rule 103.3 Disclosure of Affiliations and Financial Interests

has been filed simultaneously with this Notice of Removal, pursuant to Local Rules 103.3 and 103.5(c).

WHEREFORE, Defendant, Central Credit Services, LLC, gives notice that this action is removed from the District Court of Maryland for Prince George's County, to the United States District Court for the District of Maryland.

Dated: July 6, 2017.

Respectfully Submitted,

/s/

Patrick D. McKevitt (Bar No. 30078)
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*Attorneys for Defendant,
Central Credit Services, LLC*

CERTIFICATE OF SERVICE

I hereby certify that on July 6, 2017 a copy of the foregoing was served electronically via CM/ECF and via first class mail, postage prepaid on the following:

Joe Johnson – Pro Se
P. O. Box 441572
Fort Washington, MD 20749

/s/
Patrick D. McKevitt (Bar No. 30078)